# Highlights of Proposed

# Drinking Water Systems General NPDES Permit

### Proposed General Conditions

- Best Management Plan (BMP) required
- Numeric effluent limits for chlorine and pH
- Action level for turbidity

### Proposed Best Management Practices (BMP) Plan Requirements

- BMP Plan to specify practices that minimize the frequency of discharges and manage discharges to prevent impacts on receiving waters.
- BMP Plan may reference other plans and standard operating procedures.
- Key BMP Plan Items:
  - Contingency and Emergency Response Planning
  - Personnel Training
  - Routine Management Practices
  - Dechlorination Practices
  - Sediment and Erosion Control Practices
  - Pre-discharge Trash and Debris Removal Practices
  - Copper Management Practices
  - Annual Audit (at minimum)
  - Evaluation of Sediment/Erosion BMP improvements in response to turbidity action level exceedances

### Proposed Chlorine Numeric Effluent Limit – 0.019 mg/L

- Compliance determination based on a minimum detection level of 0.05 mg/L.
- Total chlorine residual sampling results to be reported as one single sample or the average of more than one sample collected within five minutes.

### Proposed pH Limits – 6.5 to 8.5

- A discharge that exceeds a pH limit is not a permit violation if the Discharger demonstrates that the discharge did not cause or contribute to the receiving water pH to be less than 6.5 or greater than 8.5, or cause a change in the receiving water pH by more than 0.5 standard units (s.u.).

### Proposed Turbidity Action Level – 50 NTU

- Turbidity monitoring to be required only for discharges of raw water (altered or unaltered discharges) and discharges resulting from trench dewatering.
- An action level is proposed instead of numeric limits because sediment loads vary widely with site-specific discharge conditions.

### Proposed Monitoring Requirements

- **Planned Discharge Monitoring:**
  - If the original total chlorine residual concentration is less than or equal to 4.0 mg/L, monitoring is required for discharges that last longer than 5 minutes. Implementation of BMPs is required regardless of discharge duration.

    - **Minimum Monitoring Frequency**. The proposed minimum monitoring frequency for planned discharges is once per hour (or once per discharge if duration is less than 1 hour), and then once per 8 hours after flow has been stabilized.
  - If the original total chlorine residual concentration is greater than 4.0 mg/L (also referred to as "superchlorinated"), the discharge is to be monitored regardless of duration.
    - **Minimum Monitoring Frequency.** The proposed minimum monitoring frequency for such discharges is to be once per hour (or once per discharge if duration is less than 1 hour).
- **Unplanned Discharges:** The requirement to monitor, and corresponding frequency of monitoring is based on the discharge's threat to public health and safety, and other factors associated with control of the discharge and threat to water quality.

- **Receiving Water Monitoring:** Triggered by exceedance of numeric effluent limits for chorine or pH and/or turbidity action level, or when discharges result in adverse impacts to water quality or receiving water beneficial uses (e.g., fish kills, sediment plumes, or stream channel scour).

**Proposed Notification and Reporting Requirements**

- **Conditions to Notify California Office of Emergency Services (CalOES):** A discharge of any volume that results in adverse impacts to water quality or receiving water beneficial uses (e.g., fish kills, sediment plumes, or stream channel scour), endangers or threatens to endanger public health or safety, or endangers or threatens to endanger property.

- **Conditions to Notify the Regional Water Board:**
  - **Large Planned Discharges.** Pre-notification to the Regional Water Board for large planned discharges.
  - **Chlorinated Discharges**. Notify the Regional Water Board of discharges that meet the criteria below:
    - A discharge of 50,000 gallons or more with an original total chlorine residual concentration between 0.019 mg/L and 4.0 mg/L.
    - A discharge of any volume with an original total chlorine residual concentration greater than 4.0 mg/L.

- **5-Day Written Reports**
  - Required for any discharge that requires a notification to CalOES.
  - Required for any other discharge on a case-by-case basis upon request by the Executive Officer.

- **Annual Reports**
  - Annual reports proposed to include inventory of every planned and unplanned discharge event.
  - Annual reports proposed to include list of exceedances of numeric effluent limits and turbidity action level, and results of BMP Plan audits.